

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: WAVE 2 CASES	

DEFENDANTS' MOTION TO EXCEED PAGE LIMITATION

Defendants Ethicon, Inc. and Johnson & Johnson respectfully request that the Court afford them leave to exceed the 20-page limitation set forth in Local Rule 7.1(a)(2), as it relates to their forthcoming response in opposition to Plaintiffs' motion to exclude the general expert opinions of Dr. Shelby F. Thames, Ph.D. As support for this motion, Defendants submit that there are many aspects of Plaintiffs' motion that require a detailed response.

Dr. Thames is a polymer scientist who has been disclosed as an expert for Ethicon in numerous Wave 2 cases. His opinions deal with complex scientific and technical questions, and address issues raised by Plaintiffs' materials scientists and pathologists. Defendants submit that many of Plaintiffs' assertions regarding Dr. Thames's opinions require a detailed response. Defendants further submit that the Court will benefit from a comprehensive assessment of the science underlying Dr. Thames's opinions.

For all of these reasons, Defendants submit that they have presented good cause for relief from the page limitation requirements, and respectfully request that the Court allow them to present a 25-page brief responding to Plaintiffs' motion to exclude Dr. Thames's opinions.

Respectfully submitted,

/s/ David B. Thomas

David B. Thomas (W.Va. Bar #3731)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 25338
(304) 414-1807
dthomas@tcspllc.com

/s/ Christy D. Jones

Christy D. Jones
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4523
christy.jones@butlersnow.com

COUNSEL FOR DEFENDANTS
ETHICON, INC. AND JOHNSON & JOHNSON

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/s/ David B. Thomas

David B. Thomas (W. Va. Bar No. 3731)

Thomas Combs & Spann, PLLC

300 Summers Street, Suite 1380

P.O. Box 3824

Charleston, WV 25338-3824

(304) 414-1800

dthomas@tcspllc.com